

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE
PERIOD JUNE 1, 2023 THROUGH JUNE 30, 2023**

Debtor: LTL Management LLC

Applicant: Orrick, Herrington & Sutcliffe
LLP

Case No.: 23-12825-MBK

Client: LTL Management LLC

Chapter: 11

Case Filed: April 4, 2023 (the "Petition
Date")

**SECTION 1
FEE SUMMARY**

☒ Monthly Fee Application No. 3 or ☐ Final Fee Application

Summary of Amounts Requested for the Period from June 1, 2023 through June 30, 2023
(the "Third Statement Period").

Total Fees:	\$156,670.54 ¹
Total Disbursements:	\$766.16
Total Fees Plus Disbursements:	\$157,436.70
Minus 20% Holdback of Fees:	\$31,334.11
Amount Sought at this Time:	\$126,102.59

	<u>FEES</u>	<u>EXPENSES</u>
Total Previous Fees Requested:	<u>\$186,609.50</u>	<u>\$108.59</u>
Total Fees Allowed to Date:	<u> </u>	<u> </u>
Total Retainer (If Applicable):	<u>\$0.00</u>	<u>\$0.00</u>
Total Holdback (If Applicable):	<u>\$37,321.90</u>	<u>\$0.00</u>
Total Received by Applicant:	<u>\$0.00</u>	<u>\$0.00</u>

¹ The total amount of fees and expenses incurred by Orrick during the Third Statement Period for matters in which it is solely representing the Debtor (invoice number 2117988) or is representing the Debtor jointly with Johnson & Johnson ("J&J") (invoice number 2117987LTL accounting for the portion allocated to the Debtor) is \$156,670.54 in fees and \$766.16 in expenses. Of this amount, as set forth in this fee statement, Orrick is seeking payment in the amount of \$126,102.59 from the Debtor. Orrick's fees for matters in which it is solely representing J&J are not reflected in this monthly fee statement.

COMPENSATION BY: PROFESSIONAL JUNE 1, 2023 THROUGH JUNE 30, 2023

The attorneys who rendered professional services in this chapter 11 case during the Third Statement Period are:

Invoice 2117988 (for services rendered on behalf of the Debtor):

Name of Professional: Partners	Year Admitted	Department	Hourly Rate	Total Hours Billed	Total Fees
Harrison, Stacy W.	1994	Complex Litigation and Dispute Resolution	\$1,200.00	0.30	\$360.00
Grand Total				0.30	\$360.00

Name of Professional: Associates	Year Admitted	Department	Hourly Rate	Total Hours Billed	Total Fees
Naulo, Mariya	2014	Restructuring	\$844.00	5.00	\$4,220.00
Weber, Lauren A.	2017	Supreme Court and Appellate	\$807.00	1.00	\$807.00
Grand Total				6.00	\$5,027.00

Professionals	Blended Rate	Total Hours Billed	Total Fees
Partner	\$1,200.00	0.30	\$360.00
Associate	\$837.83	6.00	\$5,027.00
Grand Total	\$855.08	6.30	\$5,387.00
Volume Discount 1%			(53.86)
Grand Total			\$5,333.14

Invoice 2117987LTL (for services rendered on behalf of the Debtor and J&J):

Name of Professional: Partners	Year Admitted	Department	Hourly Rate	Total Hours Billed	Total Fees
Bicks, Peter A.	1986	Complex Litigation and Dispute Resolution	\$1,200.00	1.00	\$1,200.00

Loeb, Robert	1987	Supreme Court and Appellate	\$1,200.00	15.40	\$18,480.00
Rosenkranz, Joshua	1986	Supreme Court and Appellate	\$1,200.00	54.80	\$65,760.00
Stengel, James L.	1980	Complex Litigation and Dispute Resolution	\$1,200.00	1.50	\$1,800.00
Scotten, Naomi	2011	Supreme Court and Appellate	\$910.00	58.90	\$53,599.00
Grand Total				131.60	\$140,839.00

Name of Professional: Associates	Year Admitted	Department	Hourly Rate	Total Hours Billed	Total Fees
Barnard-Yanni, Alyssa	2015	Supreme Court and Appellate	\$844.00	41.00	\$34,604.00
Bhatti, Upnit K.	2015	Complex Litigation and Dispute Resolution	\$844.00	95.00	\$80,180.00
Pavone, Paige	2015	Complex Litigation and Dispute Resolution	\$844.00	0.60	\$506.40
Savin, Anne	2001	Supreme Court and Appellate	\$844.00	1.00	\$844.00
Shaw, Geoffrey	2016	Supreme Court and Appellate	\$844.00	15.50	\$13,082.00
Hennessee, Zachary	2018	Supreme Court and Appellate	\$756.00	0.60	\$453.60
Wegrzyn, Brian	2009	Financial and Fintech Advisory	\$844.00	4.90	\$4,135.60
Grand Total				158.60	\$133,805.60

Name of Professional: Paralegals	Department	Hourly Rate	Total Hours Billed	Total Fees
Gerrish, Amy S.	Supreme Court and Appellate	\$375.00	42.40	\$15,900.00
Kunkler, Patrick P.	Litigation General	\$375.00	15.90	\$5,962.50
Walker, Elizabeth Y.	Litigation General	\$375.00	24.60	\$9,225.00
Grand Total			82.90	\$31,087.50

Professionals	Blended Rate	Total Hours Billed	Total Fees
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Partner	\$1,070.21	131.60	\$140,839.00
Associate	\$843.67	158.60	\$133,805.60
Paralegal	\$375.00	82.90	\$31,087.50
Total	\$819.44	373.10	\$305,732.10
Volume Discount 1%			(3,057.29)
Total			\$302,674.81
Portion Billed to J&J			(151,337.41)
Grand Total			\$151,337.40

**SECTION II
SUMMARY OF SERVICES**

COMPENSATION BY WORK TASK CODE FOR SERVICES

**RENDERED BY ORRICK, HERRINGTON & SUTCLIFFE LLP
FOR THE PERIOD JUNE 1, 2023 THROUGH JUNE 30, 2023**

Invoice 2117988 (for services rendered on behalf of the Debtor):

DESCRIPTION	HOURS	FEES
Fee/Employment Applications	5.00	\$4,177.80
Litigation	1.30	\$1,155.34
Total Fees Requested	6.30	\$5,333.14

Invoice 2117987LTL (for services rendered on behalf of the Debtor and J&J)

DESCRIPTION	HOURS	FEES
Litigation	373.10	\$302,674.81
Portion Billed to J&J		(151,337.41)
Total Fees Requested		\$151,337.40

**SECTION III
SUMMARY OF DISBURSEMENTS**

**DISBURSEMENT SUMMARY BY ORRICK, HERRINGTON & SUTCLIFFE LLP
FOR THE PERIOD JUNE 1, 2023 THROUGH JUNE 30, 2023**

DISBURSEMENTS	AMOUNT
Outside Services	\$1,532.32
DISBURSEMENTS TOTALS	\$1,532.32
Portion Billed to J&J	\$(766.16)
DISBURSEMENTS TOTALS	\$766.16

**SECTION IV
CASE HISTORY**

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|--|--|
| (1) Date Case Filed | April 4, 2023 |
| (2) Chapter Under Which Case Commenced: | Chapter 11 |
| (3) Date of Retention: | June 16, 2023 <i>nunc pro tunc</i> to April 4, 2023 [Dkt. 801] (the “ <u>Retention Order</u> ”) ² |
| (4) Summarize in brief the benefits to the estate and attach supplements as needed | SEE BELOW |

During the Third Statement Period, Orrick, Herrington & Sutcliffe LLP (“Orrick”) provided the following services to the Debtor including, but not limited to, the following:

Litigation

- Drafted and revised retention application and supporting documents.
- Drafted, revised, and coordinated filing of court-mandated status report.

Litigation

- Draft reply brief in California litigation.
- Reviewed and analyzed pleadings, and performed associated legal research and record review.
- Communicated and coordinated with team and client on case status.

(5) Anticipated distribution to creditors:

(a) Administrative expense	Unknown at this time.
(b) Secured creditors	Unknown at this time.
(c) Priority creditors	Unknown at this time.
(d) General unsecured creditors	Unknown at this time.

² The Retention Order is attached hereto as Exhibit A.

(6) Final disposition of case and percentage of dividend paid to creditors:

Final dividend percentages are unknown at this time.

I certify under penalty of perjury that the above is true.

Date: September 5, 2023

/s/ Robert Loeb